

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORTH WORTH DIVISION

IN RE 2014 RADIOSHACK ERISA LITIGATION)	MASTER FILE NO. 4:14-cv-00959-O
)	
THIS DOCUMENT RELATES TO:)	
)	
ALL ACTIONS)	
)	

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND CASE CONTRIBUTION AWARDS TO NAMED PLAINTIFFS

Named Plaintiffs Jeffrey Snyder, Manoj P. Singh, and William A. Gerhart (“Plaintiffs”), on behalf of the Settlement Class of participants in the RadioShack 401(k) Plan and the RadioShack Puerto Rico 1165(e) Plan (the “Plans”), hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Awarding attorneys’ fees in the amount of \$270,000, which represents 30% of the Settlement Amount;
2. Reimbursement of out-of-pocket expenses of \$40,616.03;
3. Approval of Named Plaintiffs’ Case Contribution Awards of \$5,000 to each of the three Plaintiffs in recognition of their valuable service to the Settlement Class; and
4. For such other and further relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

- A. Memorandum of Law in Support of Plaintiffs’ Motion for an Award of Attorneys’ Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs; and
- B. Declaration of Mark K. Gyandoh in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement, Certification of Settlement Class, and Approval of the Plan of Allocation and Motion For an Award of Attorneys’ Fees, Reimbursement of Expenses and Case Contribution Awards to the Named Plaintiffs, and all exhibits thereto.

Dated: June 10, 2016

Respectfully submitted,

/s/ Mark K. Gyandoh

KESSLER TOPAZ MELTZER & CHECK LLP

Edward W. Ciolko (*admitted Pro Hac Vice*)
Donna Siegel Moffa (*admitted Pro Hac Vice*)
Mark K. Gyandoh (*admitted Pro Hac Vice*)
Julie Siebert-Johnson (*admitted Pro Hac Vice*)
280 King Of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056
Email: eciolko@ktmc.com
dmoffa@ktmc.com
mgyandoh@ktmc.com
jsjohnson@ktmc.com

Interim Lead Class Counsel Committee Chair

Gerald D. Wells, III (*admitted Pro Hac Vice*)

Robert J. Gray (*admitted Pro Hac Vice*)

CONNOLLY WELLS & GRAY, LLP

2200 Renaissance Boulevard
Suite 308
King of Prussia, PA 19406
Telephone: (610) 822-3700
Facsimile: (610) 822-3800
Email: gwalls@cwg-law.com
rgray@cwg-law.com

Michael J. Klein (*admitted Pro Hac Vice*)

STULL, STULL & BRODY

6 East 45th Street
New York, NY 10017
Telephone: (212) 687-7230
Facsimile: (212) 490-2022
Email: mklein@ssbny.com

Interim Lead Class Counsel Committee Members

Roger L. Mandel
State Bar No. 12891750
Bruce E. Bagelman
State Bar No. 01509700
LACKEY HERSHMAN, LLP
3102 Oak Lawn Avenue, Suite 777
Dallas, TX 75219
Telephone: (214) 560-2201
Facsimile: (214) 560-2203
Email: rlm@lhlaw.net
beb@lhlaw.net

Interim Liaison Class Counsel

George C. Aguilar
ROBBINS ARROYO LLP
600 B Street, Suite 1900
San Diego, CA 92101
Tel: (619) 525-3990
Fax: (619) 525-3991

Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to registered CM/ECF participants.

/s/ Mark K. Gyandoh

Mark K. Gyandoh